REQUEST FOR SANCTIONS

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### DECLARATION OF DR. LUCAS MURREY

I, Dr. Lucas Murrey, declare:

- 1. That I am the plaintiff in this action; that I am over the age of 18 years and that I have personal knowledge of the facts contained in this declaration. If called upon to testify I could and would testify competently as to the truth of the facts stated herein.
- 2. This declaration is submitted in support of plaintiff's motion to compel defendant Ms. Amy Blalock's responses to his interrogatories and requests for production of documents and request for sanctions.
- 3. Facebook AWDTSG group members stated that "public records show" [that plaintiff has] involvement in [a] MURDER case of his ex[-]wife", is "suspected of murder"; [h]as several domestic violence charges filed against him"; is an "abusive murderer"; "[has] "[f]iled [...] court cases against women [...] trying to extort money from them"; "has committed fraud"; "has acted fraudulently", "has STDs", has an "ex-wife who [he] killed"; "claim[s] he is an attorney"; and that plaintiff is listed on the California court's public record as being a "vexatious litigant".
- 4. A true and correct copy of said harmful statements is hereto attached as Exhibit "A".

- 5. All of the above-noted statements are false. Of the hundreds of Facebook accounts involved not a single woman has come forward who I have ever met in person other than one who I met for less than fifteen minutes because I saw that she did not resemble her pictures and I refused to go on a date with her and politely excused myself forthwith. Of the remaining Facebook accounts only a small fraction of women (so far only three) have had any communication with me e.g. via a few text messages and I rejected each and every one. Said cyber-attack has led to off-line harassment of myself, loved ones, family, friends, colleagues, and anyone perceived to be associated with me, I have received multiple death threats and suffered serious damages, including, but not limited to the loss of income and potential work and I am currently being treated for the severe harm he suffered.
- 6. Among the goals of these unusually malicious statements and cyber-attack is the creation of mass web-traffic, "click-bait", drawing attention to one-self and obtaining "Facebook points" i.e. Facebook money, money via GoFundMe.com donations, also from a national and international news media campaign, and money from securing a Netflix deal for a docuseries.
- 7. A true and correct copy of said Facebook points, money from their defamatory GoFundMe webpage, national and international media smear

campaign and attempts to make a documentary and secure a deal with Netflix is hereto attached as Exhibit "B".

- 8. Members of Facebook's AWDTSG and defendants in my case have been caught harassing men who have passed away (and thus who cannot harm anyone) and the families of men, including their wives and children, who refused to have one-night stands with them. Instead of being a safe place for women to protect one another, Facebook and its AWDTSG groups are places where drunk women cyber-attack men while they openly admit to suffering from psychological disorders.
- 9. A true and correct copy of said attacks on men who have passed, families of men, including their wives and children, and instances of women being drunk while posting on AWDTSG and admitting to having psychological disorders is hereto attached as Exhibit "C".
- 10.Blalock stated in Facebook AWDTSG groups that plaintiff: 1) stole one of her mobile phones; 2) that she secretly recorded plaintiff; 3), that plaintiff invites women he dates to a "second location" because there he murders them; 4) that plaintiff has "something to do with" all "missing women in LA"; 5) that plaintiff is going to end up on "Dateline" for all his murders; that plaintiff is similar to the infamous *Tinder Swindler* because plaintiff has also committed fraud and stolen large amounts of money; and 7) that

for these reasons plaintiff should be abandon his home and residence where he has lived for a decade

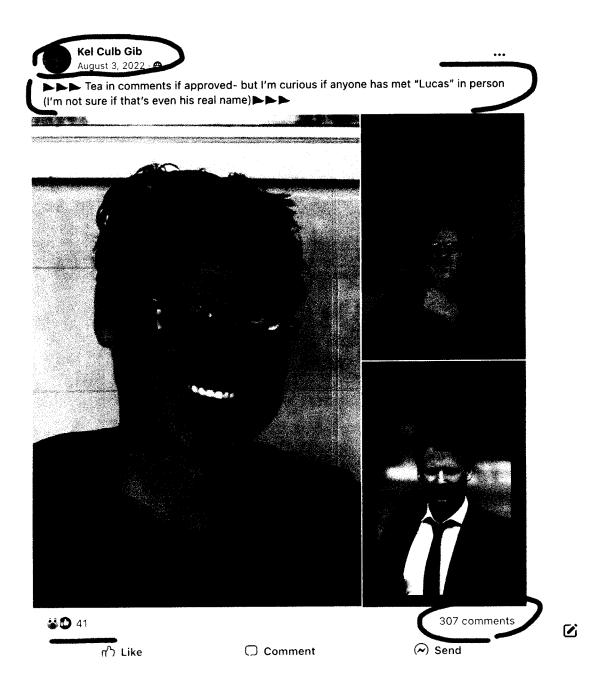
- 11.A true and correct copy of Blalock's above-noted comments is hereto attached as Exhibit "D".
- 12.Blalock has admitted in her verified responses to my requests for admission that she received GoFundMe money for her webpage that she undersigned with several other defendants and whereupon she defamed plaintiff by falsely accusing him of stalking a woman named Elly Shariat who in truth and actual fact plaintiff does not know and never stalked
- 13.A true and correct copy of Blalock's verified admission that she obtained money from her defamatory GoFundMe webpage is hereto attached as Exhibit "E".
- 14.Blalock has also obtained Facebook money via Facebook points i.e. Facebook money.
- 15.A true and correct copy of the Facebook money Blalock earned while harming me is hereto attached as Exhibit "F".
- 16. And Blalock has attempted to obtain money from securing a Netflix deal for her malicious statements against plaintiff in an envisioned docu-series.
- 17.A true and correct copy of [...] is hereto attached as Exhibit "G".

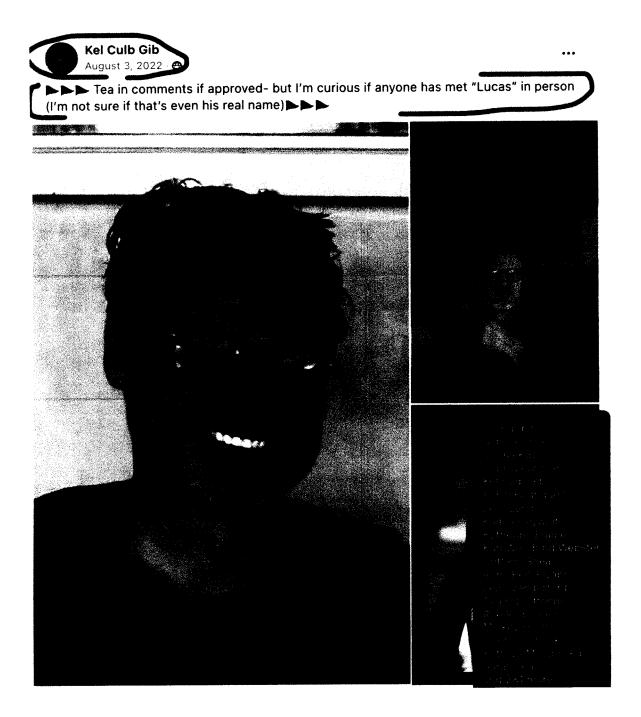
- 18.On 10 October 2024 I served Ms. Blalock with interrogatories and requests for production of documents.
- 19.A true and correct copy of said service of interrogatories and requests for production of documents is hereto attached as Exhibit "H".
- 20. After Ms. Blalock failed to respond timely to my interrogatories and requests for production of documents I sent her a meet & confer letter on 10 November 2024 informing her that by failing to respond within 30 days she waived all objections and still needed to answer. Defendant responded on 13 November 2024 wherein she frivolously sought to evade answering. In good faith I responded with a second meet & confer letter advising her once again that I would file a motion to compel if she failed to respond with complete and thorough responses. Ms. Blalock then responded on 13 November 2024 informing stating that: "you [plaintiff] can seek your motion to compel". Further, in good faith I sent Ms. Blalock my draft of the joint stipulation attached to this motion to compel, but defendant has failed to respond and provide her half of said stipulation.
- 21.A true and correct copy of said good faith meet & confer letters and communications is hereto attached as Exhibit "I".
- 22.A true and correct copy of defendant's first response to my first set of interrogatories served on 10 October 2024 which defendant served on 17

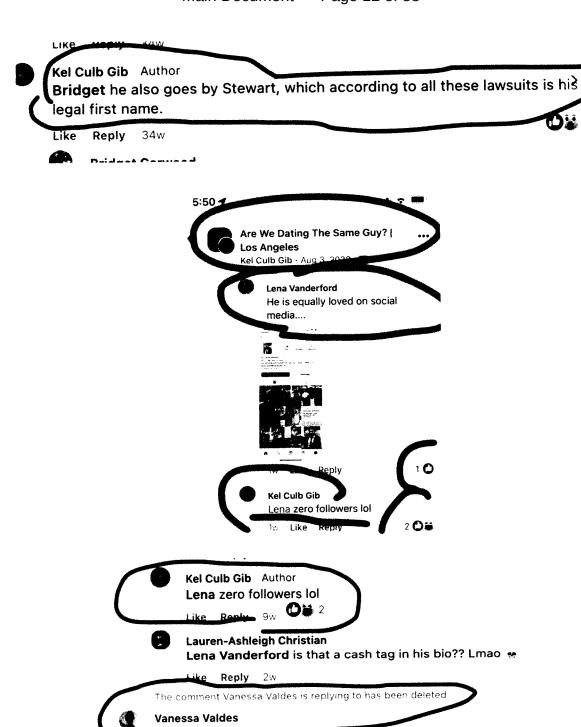
28

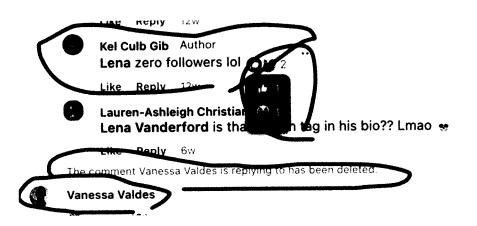
Case 2:24-ap-01152-BR Doc 33 Filed 11/19/24 Entered 11/19/24 15:58:03 Desc Main Document Page 9 of 88

**EXHIBIT A** 





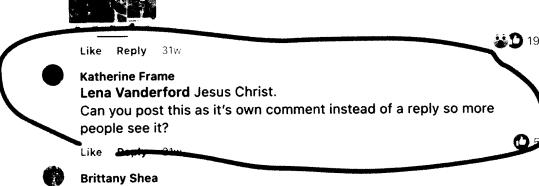






X

**(**) 2



Lena Vanderford What was the ex wife's name?

Like Reply 31w

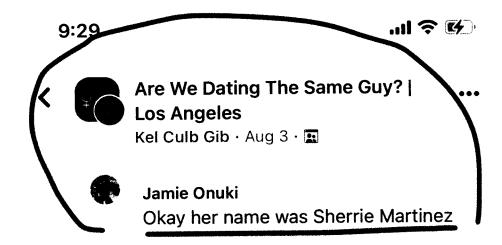
Kel Culb Gib Author

Brittany I have looked over the court docs and from what I gather, her name was Sherrie M. I'm not sure if I'm able to post her full last name- I don't want to go against group rules. If someone can confirm it's allowed I will comment but it's also listed in some of the reports that have been posted.

Like Reply 31w

**Brittany Shea** Kel Culb Gib I think I know what it is from the docs I read.

Like Reply 31w





X

0

avannah Valencia read this it's crazy

Like Reply 27w

Kel Culb Gib Author

Hey everyone, I've tried reporting Lucas through Hinge a couple of times and haven't heard back.

I don't have Bumble so I'm unable to report him there, according to their website. Would anyone else be able to do it?

Like Reply 28w

Lena Vanderford

Kel Culb Gib I actually know someone on the board at Bumble. Did anyone find his Facebook or any social media, email etc? That will help get him

panned

Like Reply 28w

Kel Culb Gib Author

Lena we found all of his lawsuits on Google by typing his name in. I know his Twitter and the cell number he gave me but not sure if it's still active. He doesn't seem to care about hiding so I'm sure his Facebook would be relatively easy to track down if he has one!

Like Reply 28w

Kel Culb Gib

Author Open to messaging Eve Salazar he pressed lawsuits against a number of women to extort money from them and was suspected in the murder of his ex wife. I think the doc could investigate the murder since he clearly didn't go to jail about it and instead of accuse him just plant seeds of speculation.

Like Reply 1d



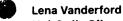
### **Kel's Post**

X

0

One of your matches Lucas M, was recently removed from Hinge based on information regarding potentially fraudulent\* behavior. We are notifying you because you matched with this user. While Hinge cannot verify the accuracy of such information, it achiese you for remain cautious in your online interactions with all individuals who you do not already know.

Like Reply 28w



Kel Culb Gib yes! "Fraudulent" meaning abusive murderer?

Like Reply 28m

Kel Culb Gib Author

Lena this was at the end of the email lol so I guess all his extortion lawsuits A they're gliding right on past that murder suspicion

\* Fraudulent behavior includes but is not limited to using a false identity or posing a significant risk of attempting to obtain money from other users through deceitful means.

Like Reply 28w

Lena Vanderford

**Kel Culb Gib I** guess we should all be looking out for a fresh hinge profile

Like Reply 28w

**Katherine Frame** 

Okay. So I googled and YIKES ON BIKES, here are the top google results:

X



COOK I LIG I LINEN.COM

Docket for Dr. Stewart Lucas Murrey v. Cheaterreport.com, 2:21-cv-08140 - CourtListener.com

Like Reply 31w





#### Naomi Joy Garcia

**MOTIONS**: Plaintiff's Motion to Compel Further Responses to Form interrogatories and Sanctions

HEARING DATE: 12/18/2020

#### **Background/ Discovery Dispute**

Plaintiff Dr. Stewart Lucas Murrey filed a complaint against Jenney Lee for intentional infliction of emotional distress and conversion. The parties were allegedly in a romantic relationship. Plaintiff alleges that Defendant tried to extort money from him by pretending to be someone else and claiming that she was pregnant. Defendant also allegedly destroyed some of Plaintiff's dress shirts and other personal property.

On August 28, 2020, Plaintiff filed a motion to compel further responses to form interrogatories, and requests sanctions

Like Reply 31w





Kel Culb Gib Author

Naomi omg ... suing a company that catches <u>cheaters and the</u> suspicion of murdering his wife?! Dateline vibes.

Like Reply 31w





Kel Culb Gib Author SeAirra Dittenber

Like Reply 29w



Crisna Kay

Someone tag me when op posts deets. This is insane

Like Reply 31w



→ View 1 more reply



Kel Culb Gib Author

Crisna I'm heading home from the studio right now to pour my tea but it



Kaitlin Lillywhite I'm living for this thread

Like Reply 35w

**(**) 23



Kel Culb Gib Author

UPDATE: REPORTED AND REMOVED FROM HINGE.

But he is obviously a predator so keep in mind he could make new profiles with new names or false info if his ego is damaged enough from being removed (he is an overt narcissist so caution is necessary!)

I don't have Bumble or Tinder so I'm not sure how to report him from there, if you've matched with him on either place I encourage you to try to have him removed from those as well.

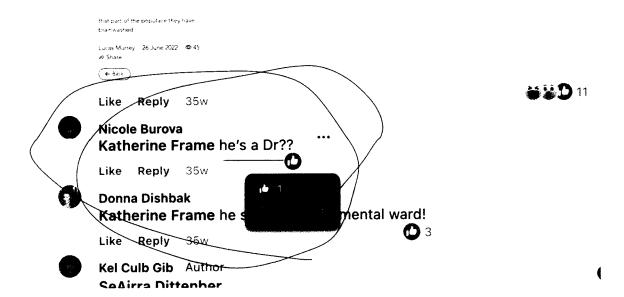
#### STAY SAFE LADIESSSS!!



Like Kepiy 5

→ 1 Reply

**O** 7







👚 Kel Culb Gib 5d 🗵

Kel Culb Gib

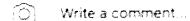
#### At his age, that's a huge red flag >

Author 👚 ••• Orane he told me about his published books and how be does podcasts with scholars, Lallon't look up his books until last night but they're both about German poets/philosophers who were obsessed with Greek tragedy and Dionysian poetry which includes the balance between "terror and excitement\* and society's focus on visualization in comparison to wealth and money as it relates to tragedy. Dude is basically obsessed with tragedy and money. His Twitter is full of Bitcoin garb and conspiracies.

4d Like Reply



Kel Culb Gib I bet if we do some researches he doesn't have a phd. He maybe attended the program but never finished it....









3 **(**)

.el 🗢 😘

17 OO















#### **Elly Shariat**

Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/ replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geo-tagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client,... See more

iad Like Reply 6 🗱🐇

freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't we go somewhere more private to discuss our work. At that point my client and I said sorry to Lucas and that we have to go with the British guy because there's a major deal we are working on so we left and Lucas huffed and puffed. (British guy had prepaid our tab, unbeknownst to us, so we wouldn't be hampered in trying to leave.) In the elevator the nice Brit mentioned how sorry he was for his gender and that seeing how distraught and panicked I was made him almost call the cops but that the bartender knew if Lucas tried to follow us to def call the cops. To this day I feel incredibly lucky that guy interjected and stepped in. Still thinking about that afternoon scares tf out of me. Lucas should NOT be allowed on any of these apps because he really is dangerous af.



Kel Culb 200

#### Kel Culb Gib

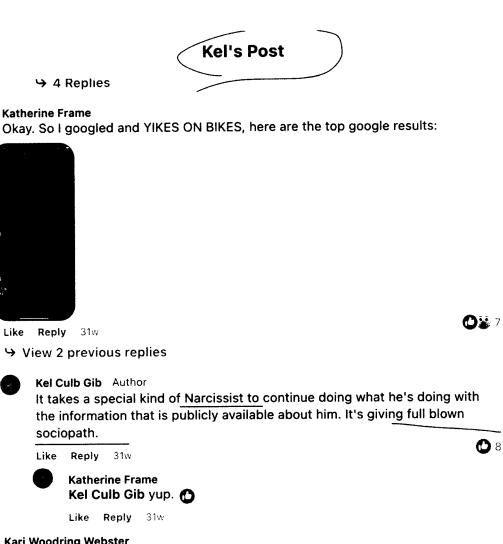
Elly Shariat omg! Did you get the British guys name?? That guy might have saved you from some serious trauma. I'm so sorry that happened to you! Lucas needs to be friggin stopped like wtf it the solution here ??

0

4d Like Reply

#### Elly Shariat

Kel Culb Gib sadly, we never got his info and I legit feel AWFUL that we didn't. He came to my client's room an hour after rescuing us, saw I was still upset and shook up, and even took us to Nobu in WeHo for dinner to help me get my mind off what happened. He was a perfect gentleman, incredibly kind, tall, and handsome, but I was so distraught about Lucas that it never registered for me to get his info. My client tried to use the context clues he had given



×

Kari Woodring Webster

Wow. Talk about going down a rabbit hole. His Twitter makes him look insane and all the court cases. Wow

**O** 5 Like Reply 31w

Donna L Anderson Kari Woodring Webster I wonder what they are for and how many were LIKE REDIV 34W



This guy clearly has an affinity for lawsuits, ladies, so let's just not even mention this post 😁 Don't even tell your diaries 🕰

Reply 35w



#### **Nicole Burova**

Looks harmless and this is probably a paradigm example of looks being



### Kel Culb Gib

Author Open to messaging

Kera H Bjornerud we wouldn't have to mention the group at ALLLLL. Could just say I met a girl and talked about it and she had the same experience and knew someone else with the same experience and snowball from there!

1d Like Reply



Author Open to messaging

Kera H Bjornerud or even just say I googled him when my gut told me to cancel because his lawsuits are ALLLLLL public record and he uses

his real name



1d Like Reply



## Kel Culb Gib

Author Open to messaging Actually just screenshot the pictures themselves, don't mention the group or show the group name at all.

1d Like Reply



### Kel Culb Gib

Jacqui I can sceen shot the message I sent these girls to give you an idea of what I was thinking

Like Reply 3d



# Jacqui Blue

Kel Culb Gib Yes, DM me.

Like Reply 3d

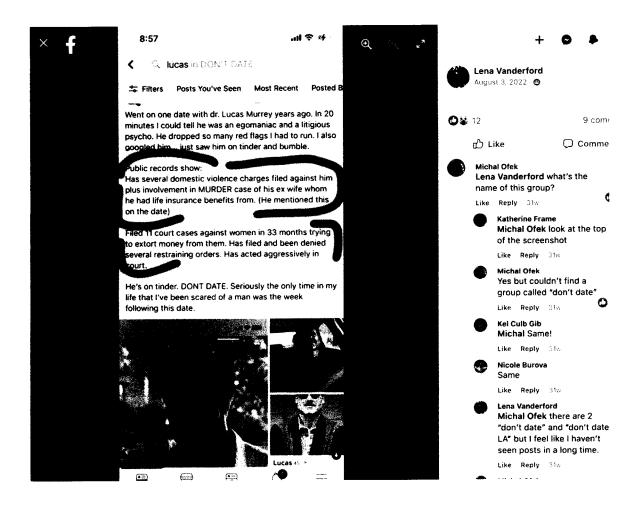


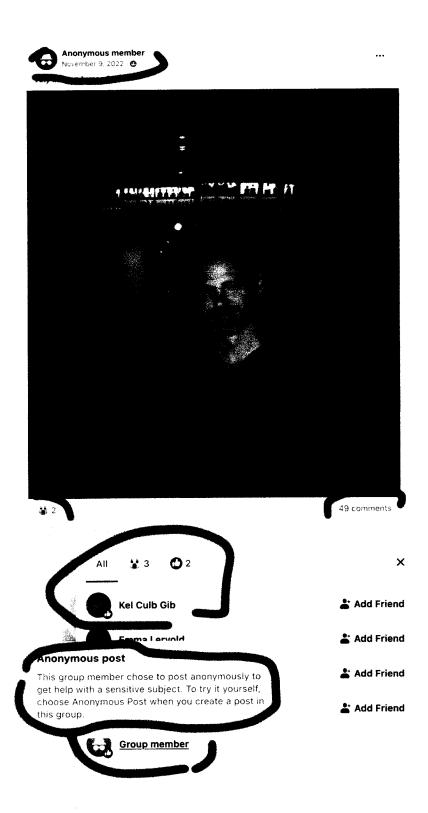
Jacqui Blue it might go to your requests (which I forget to check REGULARLY lol just fyi) if you don't see it in main

3d Like Reply



Rules





X

**5** 

## **Group member's Post**

**Liv Burger** 

Group member god how funny would it be if we gathered all of the women he has tried to bamboozle at the same place and time as your date. Just sitting, chatting, scattered around innocently. He would néver go back again. 👄

Like Reply 17w

Group member Author

Liv Burger I'm so down for this. Then we can all write a book about it and dedicate it to him

Some of us can dress like CIA agents and get him spooked out.. or wear shirts with picture of his ex who was killed.

Like Reply 17w

Group member Author Liv Burger we can name the book "the deadliest swipe"

Like Reply 17w

**Liv Burger** 

aine itepiy ain

Group member Author

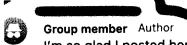
Liv Burger yep that's what he said

tike Reply 21w

**Group member** Author

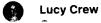
Liv Burger seriously something is so weird about all of this. I feel like we should go undercover and get him to confess his crimes! I bet he has some serious skeletons in his closet

I feel like this is a movie and I haven't blocked him yet so he's still in the rafters waiting for me to meet him at his creep spots. I wonder what the workers know/think? There's a reason he goes to the same spots



I'm so glad I posted here. I never met him yet so that was a close call! He said he was an Attorney on hinge but what's odd is today I got an email from hinge saying they banned a member named Luke for fraudulent behavior, but I had 2 Luke's I matched with, but after work I checked and he was gone and the other was still there so obviously it was him.

Like Reply 21w



## **Kel's Post**

manipulate and coerce to his house for some reason. It's so eerie.

tike Reply

Elly Sharjat

Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geotagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't we go somewhere more private to discuss our work. At that point my client and I said sorry to Lucas and that we have to go with the British guy because there's a major deal we are working on so we left and Lucas huffed and puffed. (British guy had prepaid our tab, unbeknownst to us, so we wouldn't be hampered in trying to leave.) In the elevator the nice Brit mentioned how sorry he was for his gender and that seeing how distraught and panicked I was made him almost call the cops but that the bartender knew if Lucas tried to follow us to def call the cops. To this day I feel incredibly lucky that guy interjected and stepped in. Still thinking about that afternoon scares tf out of me. Lucas should NOT be allowed on any of these apps because he really is dangerous af.

• >

Like Reply



Liv Burger
Elly Shariat omg that's terrible!

Like Reply

→ 7 Replies

€

Reply

Kel Culb Gib

Elly Shariat omg! Did you get the British guys name?? That guy might have saved you from some serious trauma. I'm so sorry that happened to you! Lucas needs to be friggin stopped like wtf is the solution here ?? 🤌

Like Reply

**Elly Shariat** 

Kel Culb Gib sadly, we never got his info and I legit feel AWFUL that we didn't. He came to my client's room an hour after rescuing us, saw ! was still upset and shook up, and even took us to Nobu in WeHo for dinner to help me get my mind off what happened. He was a perfect gentleman, incredibly kind, tall, and handsome, but I was so distraught about Lucas that it never registered for me to get his info. My client tried to use the context clues he had given through the night to find him but we never did. It's like he was an angel who appeared out of nowhere, saved us, then disappeared. My client didn't see him at the hotel after that night either.

Like Reply

Kel Culb Gib

Elly Shariat oh well, he was a hero in disguise that night! The world works in mysterious ways- I'm glad he was there.

Lake Reply

**Elly Shariat** 

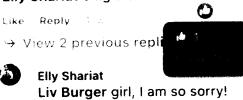
Kel Culb Gib absolutely! I'm so grateful that he appeared and the universe was looking out. I don't want any other girl to encounter him because he is so volatile and capable of anything!

Like Reply





Liv Burger Elly Shariat omg that's terrible!





Like Reply



**Elly Shariat** 

Liv Burger the timing of this thread is crazy because just two nights ago I woke up in a cold sweat after having a nightmare about the night he showed up. My fiancé has seen Lucas' pics and knows the story in case we are ever out and he spots him so we can leave but the horrible vibes he gave that night, the strength he used when he came over and grabbed my wrist saying I was hard to pin down, I am still terrified about.

Like Reply The Elbin



>

#### **Kel's Post**

One of your matches, Lucas M, was ecently removed from Hinge based on information regarding p fraudulent\* behavior. We are notifying you because you matched with this user. White Hinge cannot verify the accuracy of such information, it advises you to remain cautious in your online interactions with all ndividuals who you do not already

Poply 28W

Lena Vanderford

Kel Culb Gib yes! "Fraudulent" meaning abusive murderer?

Like Reply 28w

Kel Culb Gib Author Lena this was at the end of the email lol so I guess all his extortion lawsuits 🚇 they're gliding right on past that murder suspicion

\* Fraudulent behavior includes but is not limited to using a false identity or posing a significant risk of attempting to obtain money from other users through deceitful means.

Like Reply 28w

Lena Vanderford

Kel Culb Gib I guess we should all be looking out for a fresh hinge profile

Like Reply 28w

Katherine Frame

Okay. So I googled and YIKES ON BIKES, here are the top google results:

Like Reply 34W



This guy clearly has an affinity for lawsuits, ladies, so let's just not even mention this post 😜 Don't even tell your diaries 🕰 **O** 🙀 4

Like Reply 35w



Looks harmless and this is probably a paradigm example of looks being



Author Open to messaging

Kera H Bjornerud we wouldn't have to mention the group at ALLLLL. Could just say I met a girl and talked about it and she had the same experience and knew someone else with the same experience and snowball from there!

1d Like Reply

### Kel Culb Gib

Author Open to messaging Kera H Bjornerud or even just say I googled him when my gut told me to cancel because his lawsuits are

ALLLLLL public record and he uses

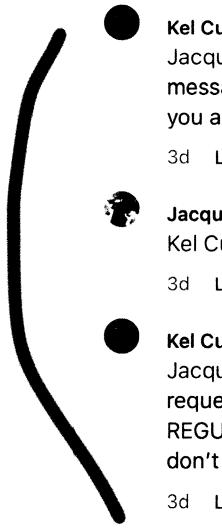
his real name 🎬

1d Like Reply

# **Kel Culb Gib**

Author Open to messaging Actually just screenshot the pictures themselves, don't mention the group or show the group name at all.

Like Reply 1d



# Kel Culb Gib

Jacqui I can sceen shot the message I sent these girls to give you an idea of what I was thinking

Like Reply



# Jacqui Blue

Kel Culb Gib Yes, DM me.

Like Reply

# Kel Culb Gib

Jacqui Blue it might go to your requests (which I forget to check REGULARLY lol just fyi) if you don't see it in main

Like Reply



Rules





#### Most relevant ~



## R.C. Salane

Pardon what do you mean this weirdo showed up at your home?? This story truly gets wilder at every turn.

u like



# Kcg Gib

R.C. 🐸 truuuuly 🗵

Like



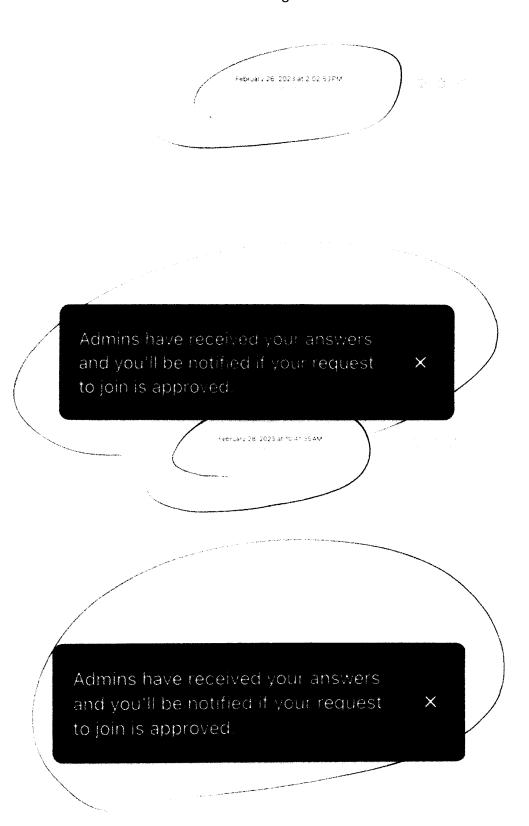
# Mark DeLisle

R.C. Salane dude showed up to serve her. She's never even met him in person and he knew where she lived and showed up personally.

Dude should have been put 6ft under in the desert somewhere with some pepper on top already.

Kegi Gib I only know you through Michele but I read the article last night... insane. I'd say this guy should be in a mental institution but he's past that, he needs to be deleted.

Sorry you're going through this.



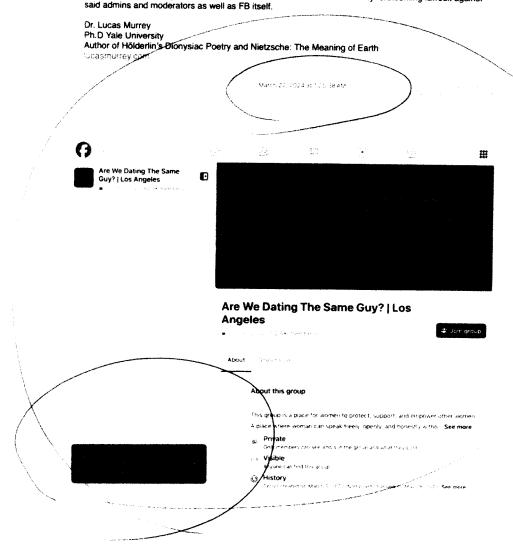


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Notice of Facebook and its Admins/Moderators Violation of My Right to Fre...

To: would flacen us have in Humblerg ground with the

You are hereby on notice that Facebook and its admins and moderators have violated my fundamental right to freedom of speech to defend my good name and reputation against extreme defamation, false light, invasion of privacy, ited and a host of other civil and criminal torts. These have been occurring and continue to occur for years now in countless Facebook private groups from which I have been denied access such that I cannot voice my opposing views to the above-noted criminal and tortious statements about my person. Thus, once again, I am requesting immediate access to all these groups including, but not limited too "Are we dating the same guy - Los Angeles" and all the other cities and counties and regions and any and all other such groups. I have a right to voice my own opposing views along with add to my comments and postings links and evidence in support thereof just as those aggressively harming my life and work have voiced their statements and provided said links. The only difference of course is that I will act within the law, which makes the violations of Facebook and its admin/moderators of my rights even more egregious. This letter will also be used as evidence in my forthcoming lawsuit against



⊕ Private group - 52.5K members

Join group

About Discussion

#### About this group

This group is a place for women to protect, support, and empower other women. A place where woman can speak freely, openly, and honestly witho... See more



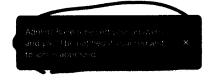
Only members can see who's in the group and what they post.

Visible

Anyone can find this group.

History

Group created on March 5, 2022. Name last changed on May 28, 2022. See more



# **PERKINSCOIE**

1888 Century Park East Los Angeles, CA 90067-1721 +1 319 788.9900 +1.319 788.3399 - PerkinsCele com

May 16, 2023

Jasmine W. Wetherell JWetherell@perkinscoie.com D. +1.310.788.3294

VIA EMAIL

2@lucasmurrey.io

Dr. Stewart Lucas Murrey 1217 Wilshire Blvd. # 3655 Santa Monica, CA 90403

Your correspondence to Meta Platforms, Inc. regarding Private Chat Groups Re:

Dr. Murrey:

We represent non-party Meta Platforms. Inc. ("Meta"), and write in response to your emails dated March 31, April 2, April 8, April 10, April 12, and May 12, 2023, demanding that Meta preserve certain data relating to the following "Private Chat Groups" on Facebook:

- "DON'T DATE"
- "Are we dating the same guy? / Los Angeles"
- "Are we dating the same guy? / Orange County OC / Irvine / Huntington Beach"
- "Don't Date Him / Dating Advice Group For Women All Around The World"
- "Are we dating the same guy? / San Diego"
- "Are we dating the same guy? / San Francisco SF / Bay Area"
- "Are we dating the same guy? / Bay Area"
- "Are we dating the same guy? / Santa Barbara / Ventura County"
- "Are we dating the same guy? / New York City"

(together, the "Private Chat Groups").

We understand from your letter that you believe certain Meta user accounts have made harassing or defamatory posts about you in these Private Chat Groups, and you are demanding that Meta preserve certain documents and information regarding these user accounts as a records custodian (the "Demand").

First, as a preliminary matter, if you purport to know or suspect who controls the targeted accounts, your preservation request should be directed to the relevant account owner. Moreover, if the information is available to you, you should preserve the information. See Calcor Space Facility, Inc. v. Superior Court, 53 Cal. App. 4th 216, 224-25 (1997) (holding that "[a]s between parties to litigation and nonparties, the burden of discovery should be placed on the latter only if the former

Personal Cole to P 162170688.1 Dr. Lucas Murrey May 16, 2023 Page 2

does not possess the material sought to be discovered.") Indeed, your emails of April 8 and May 12 appear to include a partial screenshot of at least one of the relevant posts that is known to you.

Second, Meta has not been served with any legal process relating to the Private Chat Groups, and nonparty service providers such as Meta, generally have no obligation to preserve absent a court order. See, e.g., Bright Solutions for Dyslexia, Inc. v. Doe 1, 15-CV-01618-JSC, 2015 WL 5159125, at \*2 (N.D. Cal. Sept. 2, 2015) ("unlike litigants, third-party entities have no duty to preserve absent a court order"): see also, Johnson v. United Servs. Auto. Assn., 67 Cal. App. 4th 626, 637–38 (1998) (non-parties generally do not have duty to preserve), abrogated on other grounds by Lueter v. State of California, 94 Cal. App. 4th 1285 (2002) (finding that there is no cause of action for negligent spoliation of evidence against non-parties).

The subpoenas issued to Meta in connection with *Murrey v. Cheaterreport*, et al., LASC Case No. 19SMCV00935 (the "Cheaterreport Subpoenas") are not relevant to your present Demand, and the Court's March 22, 2022, order authorizing third-party discovery in that matter did not relate to the Private Chat Groups. Moreover, our firm represented Meta in connection with the Cheaterreport Subpoenas, which are now resolved. Your demands regarding the Private Chat Groups should be directed elsewhere.

Third, to the extent your emails of May 6 and May 8, 2023, may be interpreted as a threat to take legal action against Meta based on the content of the Private Chat Groups, any claim against Meta based on its content moderation decisions is barred by Section 230 of the Communications Decency Act, 47 U.S.C. § 230(c)(1) ("CDA"). The CDA immunizes service providers such as Meta "from liability arising from content created by third parties." Fair Hous. Council of San Fernando Valley v. Roommates. Com, LLC, 521 F.3d 1157, 1162 (9th Cir. 2008). This immunity applies where a plaintiff's claim treats an interactive computer service such as Meta as the "publisher" or "speaker" of offending content created by another information content provider, such as an account holder. See Barnes v. Yahoo!, Inc., 570 F.3d 1096, 1100-01 (9th Cir. 2009), as amended (Sept. 28, 2009): see also Delfino v. Agilent Techs., Inc., 145 Cal. App. 4th 790, 806 (2006) ("CDA immunity has been applied to defendants asserting that they were interactive computer service providers or users for a variety of tort claims other than defamation," including "invasion of privacy, misappropriation of right of publicity, and negligence") (citing Carafano v. Metrosplash.com, Inc., 339 F.3d 1119 (9th Cir. 2003)). Here, CDA immunity would apply, as any lawsuit against Meta would arise solely from the actions of Facebook and Instagram account holders using its services.

Fourth, and in any event, even if Meta had received an order or proper legal process, it could not comply because your preservation letter is unduly burdensome, vague, ambiguous, and overbroad. Additionally, your correspondence seeks preservation of information outside of Meta's possession, custody, and control. For example, it seeks preservation of the employment histories of all members of the Private Chat Groups.

Dr. Lucas Murrey May 16, 2023 Page 3

If you have case law applicable to nonparties that you believe Meta should review, please provide it. Otherwise, Meta will not undertake an obligation to preserve the data, particularly in light of the broad and vague nature of the demand, as well as the fact that a party to the litigation can and should preserve the data itself.

We trust this letter resolves this matter, but please feel free to contact me at the telephone number or email address above if you would like to further discuss. Meta otherwise preserves and does not waive any other available objections or rights.

Sincerely,

Jasmine W. Wetherell

cc: Julie Schwartz, Esq.

Case 2:24-ap-01152-BR Doc 33 Filed 11/19/24 Entered 11/19/24 15:58:03 Desc Main Document Page 46 of 88

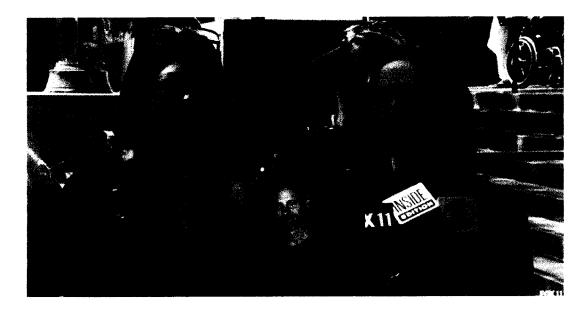
**EXHIBIT B** 

# harassed them on dating apps, defendants say

MARISA SARNOFF Mar 24th, 2024, 9:43 am

8 comments

SHARE



Olivia Berger, left, and Vanessa Valdes, right, speak at a press conference on behalf of women being sued by Stewart









Vanessa Valdes and Olivia Berger are among the defendants in the defamation and privacy case brought by Stewart Lucas Murrey

# Man sues more than 50 women for calling him a bad

**≡** Q

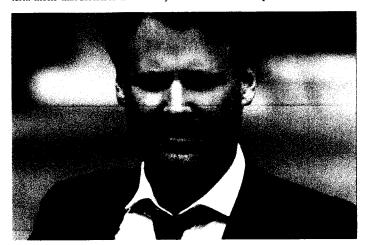




NATIONAL

### Los Angeles Bachelor Sues Dates for Smearing Him on Facebook Group Designed To 'Empower' Women Dating 'Toxic and Dangerous' Men

Stewart Lucas Murrey is classifying his women tormentors as 'femcels,' a play on the term 'incels' that describes involuntarily celibate men with a deep hatred of women.





Women respond to suit by man over negative Facebook posts about dating him | NewsNation Prime



NewsNation **⊘** 1.36M subscribers













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Mail

**EXCLUSIVE** The world's most vilified man speaks for the first time: An online female hate-mob has accused him of stalking, extortion and MURDER. But, we reveal, there are also dark episodes in h past...

By PETER SHERIDAN IN LOS ANGELES PUBLISHED: 21:00 EST, 13 April 2024 | UPDATED: 11:07 EST, 14 April 2024





#### An online female hate-mob has accused him of stalking ...

Apr 14, 2024 — Murrey claims he was attacked and defamed by 50 women - many of whom he has never met - on a Facebook group called Are We Dating The Same ...



#### LA bachelor launches LAWSUIT against more than 50 ...

Mar 21, 2024 - Stewart Lucas Murrey, from Santa Monica, has alleged that he was subjected to a barrage of false and defamatory posts and comments in the online ...



#### Judge dismisses a \$2.6 million claim by a bachelor, 32 ...

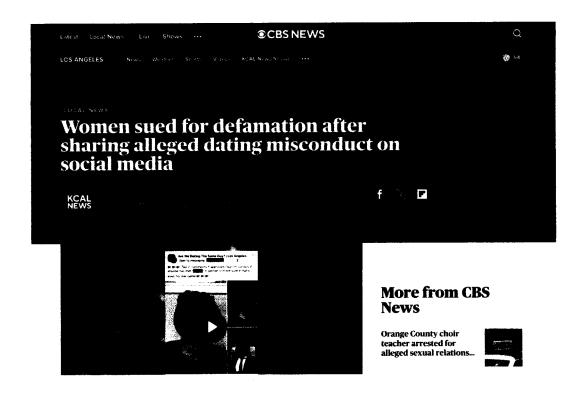
Apr 9, 2024 - Dozens of women called Stewart Lucas Murray, from Santa Monica, a 'bad date' before he took the move to sue following claims he was labeled a ...



#### The bachelor who sued 50 women for calling him a bad ...

Apr 12, 2024 — Stewart Lucas Murrey went to the Los Angeles home of Kelly Gibbons at 10.45pm and returned days later at 8.45pm.





ADVERTISEMENT













This is an archived article and the information in the article may be outdated. Please look at the time stamp on the story to see when it was last updated

A Los Angeles man is suing several women for negative posts they allegedly wrote about him on

#### MOST POPULAR

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- 2 Second earthquake strikes Inland **Empire**

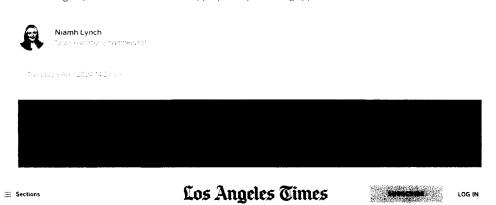






# Man suing women who claimed he was a bad date has first of 50 cases thrown out

Stewart Lucas Murrey is taking action against the women for claiming on a private Facebook group that he had behaved inappropriately on dating apps.



SOVERTISEMENT

He claimed 10 women defamed him in online 'Are we dating the same guy?' group. An L.A. court is skeptical





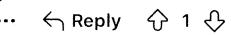
# Anyone keeping tabs on Dr. Murrey's cases?

14 upvotes • 22 comments



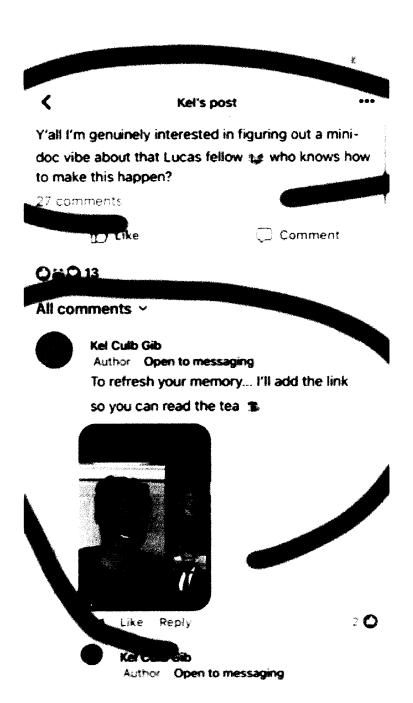
Brenda\_Barrett · 61d

Just seeing this thread. Was at the Palm Springs International ShortFest this weekend where I overheard people talking about an upcoming documentary brewing at Netflix. Apparently the two girls behind the media circus around this guy have been in talks with them.





C32165A375 OP · 61d



#### Kei Cullo Gib

Vanessa Parrotta this is the main one I was talking about but I'll tag you in my other posts too

2w Like Reply

#### Vanessa Parrotta

Kel Culb Gib unreal!!! But low key I'd be the one trying to check his freezer like someone else said 🐸 I love a good mystery

#### Army Bialock

We could all share our stories on the documentary like The Tinder Swindler.

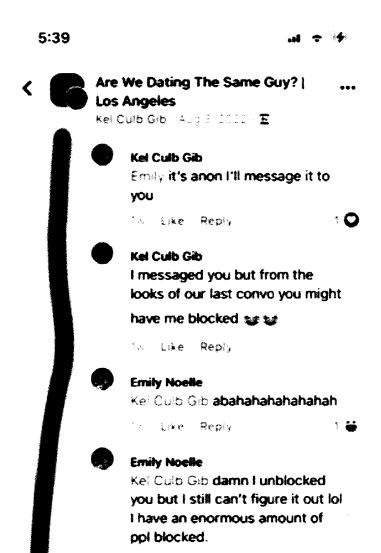
Then again, I think this would boost his ego more.

Can't win with that guy.

#### Kel Culb Gib

Author Open to messaging Amy Blalock I know right? I really just wanna talk to all the other women and get the full range of stories 😝 I did post that after a few glasses of wine. I would be semi scared but interested. Have you see Love Fraud on Showtime? I imagine it would be like that where he anrees to he

3 **(**)



's Like Reply

Like Reply

Emily maybe check requests?

Kel Culb Gib



# **Kel Culb Gib**

Open to messaging 2d · 🖪

Y'all I'm genuinely interested in figuring out a minidoc vibe about that Lucas fellow who knows how to take this happen?



27 comments

Like

Comment



# Bridget Garwood "

Kel Culb Gib shoot me a message about what you had in mind structure/storyline wise! I might be able to help.

1d Like Reply





Author Open to messaging Bridget Garwood I'll send you a message with just what I was thinking with the help of my good friend Cabernet last night . If it's any sort of plausible we can hit up Abby Meininger and work it out

Like Reply 1d



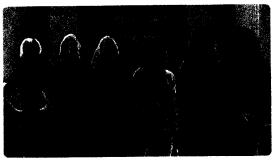


G Search Donate - Fundraise -

gofundme

About - Sign in

# Legal Defense Fund for Women of LA



Anonymous Defendant is organizing this fundraiser.

O Donation protected

Hi, thank you for taking the time to read this account of what has been our unfortunate reality over the past several months. This GoFundMe is for the currently named and active defendants in our Los Angeles defamation case.

- If you have any other pertinent INFO you'd like to share, please include \*/NFC\* in the subject line.
- if you're reaching out as a member of the MEDIA, please include "MED/A" in the subject line.

Thank you for reading, donating and sharing, we appreciate every bit of support! Please stay safe out there!

Sincerely,

Vanessa Valdes, Olivia Burger, Kelly Gibbons, Amy Blatock, Elly Shariat, and Kelyn Rodriguez.



\$5,747 raised



The organizer has currently disabled new donations to this fundraiser.

- This fundraiser is located near
- Misty Alderaan \$25 - 7 mos
- Anonymous \$100 · 7 mos
- \$10 7 mos
- \$25 · 7 mos
- Anonymous

\$5,747 (4.50)



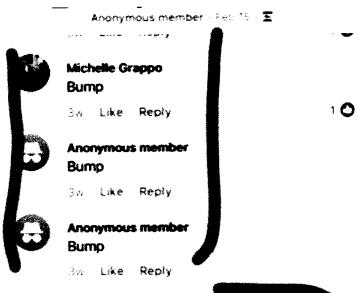
The organizer has currently disabled new donations to this fundraiser.

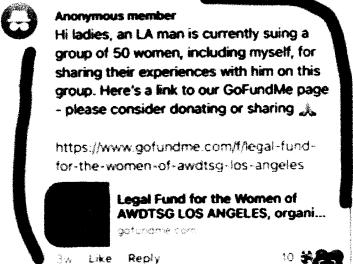
- This fundraiser is located
- near you
- Misty Alderaan
- Anonymous \$100 · 1 mo
- Anonymous \$10 1 mo
- Scout Bartlett \$25 - 2 mos
- Anonymous \$100 2 mos

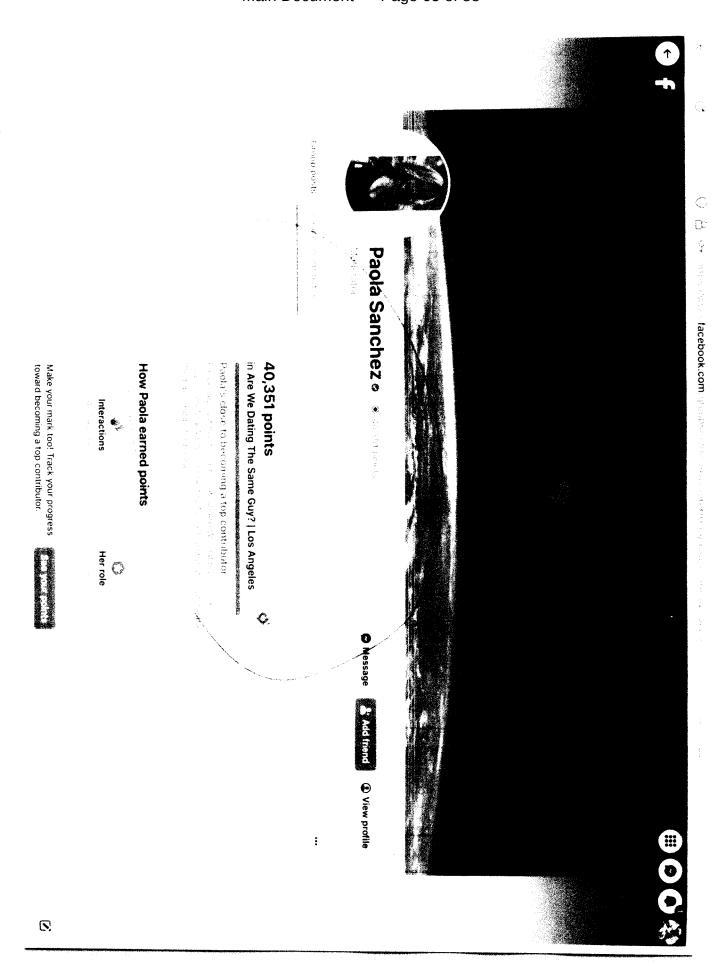
Matched with him on Tinder a few years back. He wanted to meet up IMMEDIATELY but I made it clear I couldn't because I had a client in town, also let him know my texts/replies wouldn't be timely because I'd be with my client and didn't want to be rude. He found my Instagram and even though I hadn't geotagged where in Beverly Hills I was, I guess he recognized the pool and at some point in the evening stopped by the hotel and sat down next to me and my client at the bar exclaiming "I've been looking for you all over town! You're a hard girl to pin down!" I was flabbergasted

a hard girl to pin down!" I was flabbergasted and freaking out because who tf does that?! To show up uninvited at a place I didn't tell you about? Luckily a British guy a few seats over heard everything and pretended like he knew me and my client, apologized for having a call that ran long, and said why don't w... See more

10w Reply 10 🗱













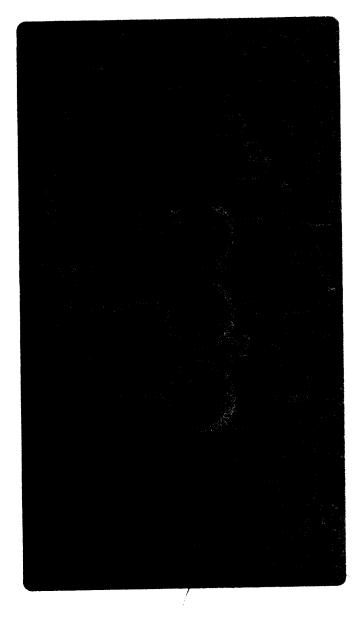
Points Earned 1,000 of 1,000

# Share

# Create A Safe Platform For AWDTSG

\$42,278 | \$42,278

医电影 经基础通货运输



Paola Sanchez is organizing this fundraiser.

dangerous and/or toxic men. across the country where women can empower each other and keep each other safe from I'm Paola Sanchez and I created and operate "AWDTSG" Red Flag Awareness groups all

I first started these groups to help solve some of the problems and dangers that me and my

147. 67. . . . .

90 **\$20** 43 mins Erin Wagner

Natasha Sanders 4 hrs

80

Tiffany Sharber

30

Linda Nguyen

go

Margaret Gleasman

90

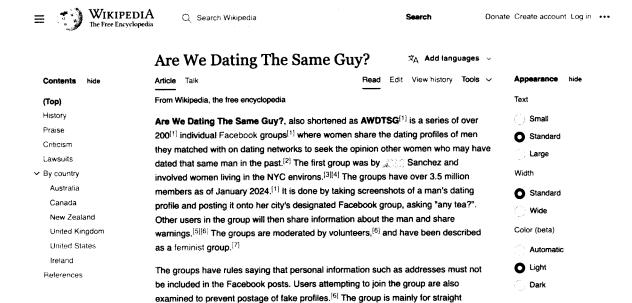
☆ See top donations



Donate to Create A Safe Platform For AWDTSG

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women.[1]

Case 2:24-ap-01152-BR Doc 33 Filed 11/19/24 Entered 11/19/24 15:58:03 Desc Main Document Page 70 of 88

**EXHIBIT C** 



# Los Angeles

Kel Culb Gib · 4d · 🖪



# Lea Stuff

This is not okay stop gossiping about this dead man

3d Like Reply





# Kel Culb Gib

Lea to be fair I had no idea he had passed when I made the post. Just to be clear, it's okay to gossip about men who are alive and not able to see the page or defend anything but not ones who unknowingly passed?

3d Like Reply

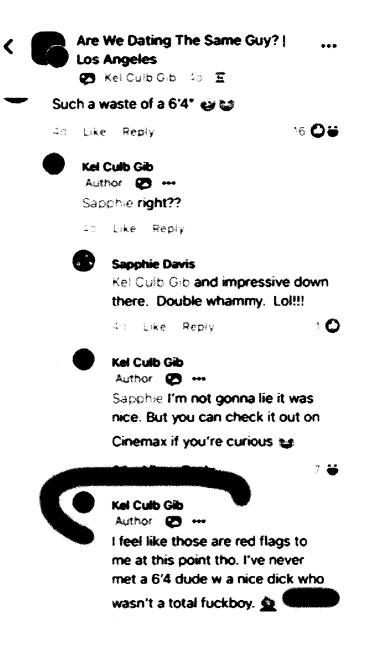




## **Kel Culb Gib**

Lea this page is supposed to be a safe space to call out men who have been disrespectful. That's what he did. Him dying doesn't change his behavior in life.

Like 3d Reply 20



### Kel's post

Kel Culb Gib

Author Open to messaging Bridget Garwood I'll send you a message with just what I was thinking with the help of my good friend

Cabernet last night . If it's any sort of plausible we can hit up Abby Meininger and work it out

Like 1d Reply



### Kel Culb Gib

Author Open to messaging Donna Dishbak I know I know, I had some wine and was sort of joking but I do think it would be really interesting to see what all we discover and to interview the (at least 11) women the has sued to hear their side of things!!

Like Reply 1d





### Donna Dishbak

Kel Culb Gib you can still do it, just get your sources triplechecked and take many precautions.

Like Reply 1d





Liv Burger
He had a partner 10000%.

Something similar happened to me years ago. Was on a layover in different city. Went to eat at a bar across the street from the hotel. Met a guy there and turns out he was staying at the same hotel. After talking for a while at the bar I invited him back to my room and we talked for a few more hours and things were starting to get hot and heavy.

He said he was gunna go grab a condom from his room and then just never came back. I was confused so I took the details he had told me (hometown, company he worked for, name) and quickly found his fb. His cover photo was of his wife and their newborn child.

I've had experiences since that seemed totally explainable on their end only to find out that they're cheating. It's becoming super common unfortunately. Sorry that happened, best to just block and move on!

1y Like Reply



### **〈** Are We Slandered By the Same Girl? Or...



Are We Slandered By the Same Girl?
Orange County -Huntington Beach - Irvine

· Follow

6d · 👌

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.



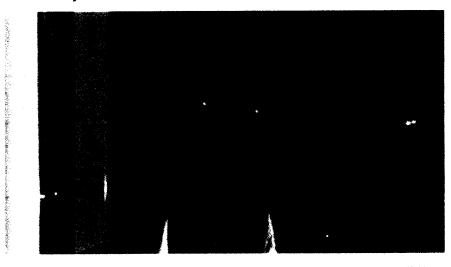






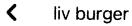


Has anyone matched with this guy? He says his name is Amir from LA



1:20 4





Posts People Reels Groups Pages



Are We Slandered By the Same Girl?
Orange County -Huntington Beach -

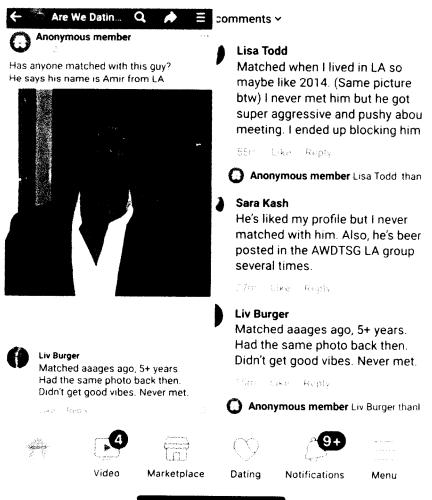
Irvine · Follow

2 25 20 2 👌

Here they are Amir trying to gossip mill and keep you out of the dating pool.

"I didn't get good vibes"
Sounds like a high school locker room!

Gee, IDK Liv Burger, maybe people change? We didn't get good vibes from your comments either.



Anonymous member - Dec 27, 2023 - E

### Top comments ~

### Kcg Gib

My current partner and I are both ASD (tho his presents differently than mine in a lot of ways), it was pretty obvious to me for a few reasons, especially being on the spectrum myself, but for starters - he's incredibly literal and takes things that people say very literally as well. Probably one of the more obvious signs is that he's beyond knowledgeable/informative about his "special interests" which for him include film, tv, marvel, and motorcycles-I'm currently on movie # 22 of 33 Marvel movies because I had never seen them and he immediately insisted we start a marathon (in order ). A lot of people on the spectrum have sensory issues; he won't wear socks because of this lol. Sometimes it can seem like he is being rude w his bluntness but he's j... See more

10w Like Reply





### Kel Culb Gib

My ex broke up with me because of my weight. He made comments throughout the relationship and I relapsed with disordered eating and had lost 20lb over 7 or 8 months when I walked in on him cheating with another girl. He ultimately told me he only cheated cause he's not used to dating women as "big" as I am and he wasn't physically attracted to me. That was 2 years ago and my disordered eating has gone the opposite way now, so I've gained 30 lbs and feel uncomfortable even trying to put myself out there to meet someone new.

This kind of thing really fucks with our self image. I hope she is okay 😂. And good on you for standing up for her and recognizing harmful behavior before it got too far.

10:21





### Are We Dating The Same Guy? | Los Angeles

Anna Kate - Feb 15 - E

has gone the opposite way now, so I've gained 30 lbs and feel uncomfortable even trying to put myself out there to meet someone new.

This kind of thing really fucks with our self image. I hope she is okay 🐸. And good on you for standing up for her and recognizing harmful behavior before it got too far.

Like Reply 700





Months later he apologized and said he was projecting his own insecurities about his (very fit?) body. But the damage was already done. He knew my biggest insecurity and made it bigger. The apology didn't make me feel better about myself.

In Like Reply



Case 2:24-ap-01152-BR Doc 33 Filed 11/19/24 Entered 11/19/24 15:58:03 Desc Main Document Page 81 of 88

**EXHIBIT D** 

**Amy Blalock** 

Back in 2017, I matched with him and before we went on a date, my coworker was like - you better look him up. So I did, saw that he is likely a sociopath. So naturally, I went on a date with him. 😝 secretly it was so I could record him bc my life needs more drama.

I have a work phone and personal phone. I put them stacked on the bar in front of me and one of them was recording. About 5 mins into sitting there, he grabbed both of my phones and was like 'let me see these' and I was like OH SHIT, I'm caught but luckily I got the phones away from him. Like who does that?

Anyway, after like one drink, he's asked me to join him at his friends house. Which I declined. It's weird how he tries to get you to leave a place with him.

Anyway, donttttt go out with this guy.

Like Reply

→ 3 Replies

こまつ

Reply

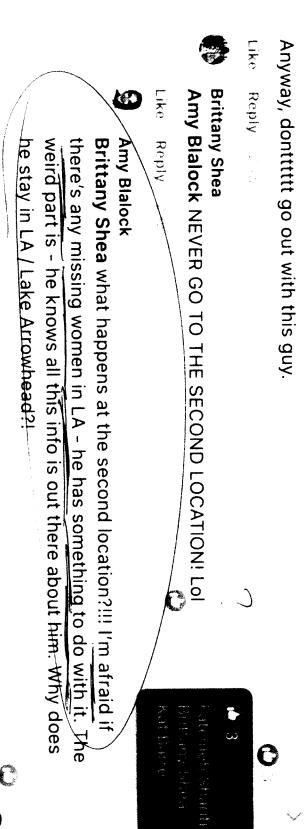


### Amy Blalock Back in 20°

naturally, I went on a date with him. 😜 secretly it was so I could record him bc my life needs more drama like - you better look him up. So I did, saw that he is likely a sociopath. So Back in 2017, I matched with him and before we went on a date, my coworker was

caught but luckily I got the phones away from him. Like who does that? both of my phones and was like 'let me see these' and I was like OH SHIT, I'm me and one of them was recording. About 5 mins into sitting there, he grabbed Anyway, after like one drink, he's asked me to join him at his friends house. Which have a work phone and personal phone. I put them stacked on the bar in front of

Anyway, dontttttt go out with this guy. l declined. It's weird how he tries to get you to leave a place with him.



11:44





### Are We Dating The Same Guy? | Los Angeles

Group member - Nov 9 - 🖫



### Kel Culb Gib

OH MY GOD RUN. I posted him a few months ago and the info is ALARMING. There's a thread in here somewhere. I got him banned from Hinge but it was either lifted or he made a new one. PLEASE DO NOT GO OUT W THIS MAN.

So Like Reply





### Lindsay Alexandra

Kei Cuib Gib 🥡

Bo Like Reply



### **Amy Blalock**

No no no no no. Read the other post with comments. Went out with him. He's going to end up on Dateline one day. Not sure why he stays in LA - so many women know he's a sociopath. I also know he uses fake profiles to access sites like this that talk about him. He's so narcissistic.

Like Reply





### **Group member**

Amy Blalock yeah I just went down the rabbit hole tonight and posted on Oc group too and wow I've never seen so and the distance of the found I late to the d



Write a comment...

















whom died

hide The Free Encyclopedia WIKIPEDIA

Search

Article Dateline NBC

From Wikipedia, the free encyclopedia

For the Australian television current affairs program. see

For other uses, see

Dateline NBC (also known simply as Dateline) is a weekly American television reality legal show that is broadcast on . . . It was previously the network's

due to program cancellations. In February 2021, the program aired its first ever docuseries. evening, often to fill vacancies in the primetime schedule on the program's respective nights editions also air at 9 or 10:00 p.m. (two-hour editions at 7 and 8:00 p.m. depending on the only occasional editions that focus on other topics. The program airs Fridays at 10:00 p.m. "The Widower", a five-hour true crime saga about a man who married six women, four of night). One or two-hour feature-length editions sometimes air on any given scheduled flagship general interest news magazine, but now focuses mainly on (9:00 p.m. Eastern for special two-hour editions). Special weekend encore stories with

Dateline NBC



Presented by

Genre

(for past anchors,

Michael Karp (1992-2007)

Composer

Tools

Read



### **Amy Blalock**

We could all share our stories on the documentary like The Tinder Swindler.

Then again, I think this would boost his ego more.

Can't win with that guy.

1d Like Reply





### Kel Culb Gib

Amy Blalock I know right? I really just wanna talk to all the other women and get the full range of stories I did post that after a few glasses of wine. I would be semi scared but interested. Have you see Love Fraud on Showtime? I imagine it would be like that where he agrees to be

## The Tinder Swindler

Article

Read

Tools ~

From Wikipedia, the free encyclopedia

lavish lifestyle on the pretext he needed the money to escape his "enemies" connect with individuals who he then emotionally manipulated into financially supporting his Israeli conman released to The Tinder Swindler is a British (born Shimon Hayut) who used the dating application on 2 February 2022. The documentary tells the story of the documentary film directed by Felicity Morris and

## Plot and background

Russian-Israeli diamond mogul An Israeli man, born Shimon Hayut, travelled around Europe, presenting himself as the son of He used the dating app to contact women as

to get more money from his victims. It is estimated that he swindled \$10 million from people contact with the victims. across the world repay his victims by sending forged documents showing fake bank transfers and then break off lure new victims, while essentially operating a credit cards in order to help. He would then use the money gained through the deception to use of his credit cards and bank accounts; the women would often take out bank loans and new asked his victims to help him financially due to the breach of 'security', supposedly hindering his had just been attacked with a knife, but that his bodyguard had saved him and was hurt. He then his "enemies", often sending the same messages and images to each woman, indicating that he charm women with lavish gifts and take them to dinners on private jets using money he borrowed from other women he had previously conned. He would later pretend he was being targeted by , and tricked them into lending him money that he would never repay. He would Sometimes he would go as far as threaten them and use manipulation Later, he would pretend to C

### Reception

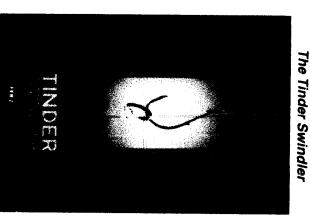
### Critical response

the film has an approval rating of 96% based on 27 reviews, with an

Running time

?

Hara di Mina di 114 minutes



Release date	Distributed by	Production company	Music by	Edited by	Cinematography	Produced by	Directed by
2 February 2022			Jessica Jones	Julian Hart	Edgar Dubrovskiy	Bernadette Higgins	Felicity Morris

Poster

9

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hide

Article

### Simon Leviev

From Wikipedia, the free encyclopedia

criminal activity became widely known in 2019 after the publication of an article titled "The Tinder and 2019 he allegedly conned an estimated \$100 million from people in a of Israeli journalist Swindler" by investigative journalists from the Norwegian tabloid Israeli con artist convicted of forgery and fraud. According to Simon Leviev ( and later with the release of the 2022 : סיימון לבייב: born **Shimon Yehuda Hayut**, 27 September 1990) is an , with the support , between 2017

Born

Simon Leviev Shimon Yehuda Hayut

Read

Tools <

prison in Israel. In 2015, Leviev was sentenced to two years in prison in Finland, and in 2019 to 15 months in

charge Penalty

Criminal status

Theft, forgery, and fraud

 15 months in Israeli prison. 3 years in Finnish prison

compensation, 150,000

20,000

Crimina

Released

Ramat Elchanan,

27 September 1990

Early life

15 he moved to Leviev was born Shimon Yehuda Hayut ( His father is Yohanan Hayut, the chief rabbi of in the US with his family's friends, According to interviews : שמעון יהודה חיות) in 1990 in Ramat Elchanan, airlines. At the age of since he was a

done by Felicity Morris, Leviev has been committing minor cons like

Imprisoned at Finland (2015), Israel (2019)

teenager. He later changed his legal name from Shimon Hayut to Simon Leviev, using the surname Leviev to pretend he was related to , an Israeli businessman known as "The King of Diamonds"

# Criminal activity and legal trouble

Israeli flight permits, and five American Express credit cards claimed he was an Israeli man born in 1978 and was found with two forged Israeli passports, three forged Israeli driver's licenses, two forged babysitting unattended. In 2015, he was arrested in In 2012, he was indicted by an Israeli court and charged with theft and forgery of checks, as well as for leaving a five-year-old he was and escaped the country across the border into belonging to a family while babysitting their child, and another's while working as a handyman at their home. In 2011, Hayut was charged in Israel with with a fake passport under the name Mordechai Nisim Tapiro, and fled to Europe. . and and was sentenced to three years in prison. When arrested in Finland, he for cashing stolen checks. According to reports, he stole a checkbook He never showed up in court